

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 07-</b>
	:	
<b>v.</b>	:	<b>DATE FILED:</b>
	:	
<b>ALLEN LITTLES</b>	:	<b>VIOLATIONS:</b>
	:	<b>18 U.S.C. § 1951(a) (Hobbs Act extortion -</b>
	:	<b>1 count)</b>
	:	<b>21 U.S.C. § 846 (conspiracy to distribute</b>
	:	<b>controlled substances – 1 count)</b>
	:	<b>Notice of forfeiture</b>

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**INFORMATION**

**COUNT ONE**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. The Pennsylvania Department of Corrections (“the PDC”) was a branch of the government of the Commonwealth of Pennsylvania.
2. The State Correctional Institution at Graterford (“SCI Graterford”) was part of the PDC and was located in Graterford, Pennsylvania, in the Eastern District of Pennsylvania. SCI Graterford housed prisoners convicted of criminal conduct in the courts of the Commonwealth of Pennsylvania.
3. Defendant ALLEN LITTLES was a corrections officer at SCI Graterford.
4. Corrections officers were responsible for guarding the prisoners housed at SCI Graterford.
5. Corrections officers at SCI Graterford were required to follow the rules

and regulations established for the operation of the prison and to ensure that prisoners followed these rules and regulations.

6. The PDC required all prison employees, including corrections officers, to abide by the Department of Corrections Code of Ethics which explicitly prohibited the following:

a. “any personal business transaction or private arrangements for personal profit which accrues from or is based upon his/her official position or authority. The scope of this provision shall include prohibition against entering into any type of business transaction or private arrangements with inmates;”

b. “solicit[ing], accept[ing], or agree[ing] to accept any gift of money or goods, loans or services for personal benefit which would influence the performance of their work duties or decision making. Correctional employees shall not accept or perform favors or accept or distribute any gifts, money or loans to or from inmates or members of an inmate’s family;”

c. “fraternization or private relationship of staff with inmates, parolees, or members of their families. This includes, but is not limited to trading, bartering or receiving gifts, money, and favors from either the inmate or the inmate’s friends, relatives or representative;” and

d. “[possessing] controlled substances . . . on state property or in any state Facility or vehicle.”

7. In violation of the Department of Corrections Code of Ethics as described above, defendant ALLEN LITTLES received cash and other benefits from prisoners and their representatives in exchange for smuggling contraband, including heroin, cocaine, and marijuana,

into SCI Graterford.

8. From in or about early 2001 through on or about February 25, 2004, in Graterford, in the Eastern District of Pennsylvania, and elsewhere, defendant

**ALLEN LITTLES**

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that defendant LITTLES obtained and attempted to obtain money, that is, at least \$1,800, which was not due defendant LITTLES and his office, from at least five different prison inmates, with each inmate's consent, under color of official right.

In violation of Title 18, United States Code, Section 1951(a).

## **COUNT TWO**

### **THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 7 of Count One are incorporated here.
2. From in or around early 2001 through on or about February 25, 2004, in Graterford, in the Eastern District of Pennsylvania, and elsewhere, defendant

### **ALLEN LITTLES**

conspired and agreed, together and with others known and unknown, and attempted, to knowingly and intentionally distribute the following: (1) approximately 23 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; (2) approximately 14.5 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; and (3) approximately 240 grams of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C) and (b)(1)(D).

### **MANNER AND MEANS**

It was a part of the conspiracy that:

3. Defendant ALLEN LITTLES obtained cash from SCI Graterford inmates to purchase controlled substances, including heroin, cocaine, and marijuana, to be smuggled into SCI Graterford for the inmates. The inmates paid defendant LITTLES for the cost of the controlled substances plus a fee of approximately \$100 to \$150 for each delivery into the prison.
4. Defendant ALLEN LITTLES obtained controlled substances and, at times, his delivery fee, from individuals outside the prison acting as representatives of the inmates who were purchasing the controlled substances. The inmates' representatives included friends and

family members of the inmates.

5. Defendant ALLEN LITTLES smuggled the controlled substances into the prison without detection because he was a trusted corrections officer who generally was not searched upon entering the prison. When there was an increased risk of being searched, defendant LITTLES concealed the controlled substances in his mouth by covering them in plastic wrap and bubble gum.

6. Defendant ALLEN LITTLES secretly distributed the controlled substances to the inmates in various ways, including hiding the drugs in the inmates' covered food trays or in the center of rolls of toilet paper, or delivering the drugs to the inmates' cells through the air vents.

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#### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania:

1. On or about September 24, 2003, defendant ALLEN LITTLES obtained marijuana from an individual known to the United States Attorney and identified here as B.M. to be distributed inside SCI Graterford to an inmate known to the United States Attorney and identified here as Inmate #1.

2. On or about September 30, 2003, defendant ALLEN LITTLES arranged with the mother of an SCI Graterford inmate known to the United States Attorney and identified here as Inmate #2 to obtain funds for the purchase of heroin for Inmate #2.

3. On or about October 5, 2003, defendant ALLEN LITTLES met inside SCI Graterford with an inmate known to the United States Attorney and identified here as Inmate #3

to arrange for deliveries to Inmate #3 of marijuana, cocaine, and heroin.

4. On or about October 16, 2003, defendant ALLEN LITTLES distributed marijuana to Inmate #3 inside SCI Graterford.

5. On or about February 25, 2004, inside SCI Graterford, defendant ALLEN LITTLES obtained \$200 in U.S. currency from an inmate known to the United States Attorney and identified here as Inmate #4 for the purchase of heroin to be distributed to Inmate #4.

All in violation of Title 21, United States Code, Section 846.

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**NOTICE OF FORFEITURE**

1. As a result of the violation of Title 21, United States Code, Section 846, set forth in this information, defendant

**ALLEN LITTLES**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense; and

(b) any property constituting, or derived from, any proceeds obtained directly or indirectly from the commission of such offense, including but not limited to the sum of \$1,800.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant,

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to

forfeiture.

All pursuant to Title 21, United States Code, Section 853.

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**PATRICK L. MEEHAN**  
**United States Attorney**